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13 | *Attorneys for Intervenor-Defendant
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL DIVERSITY, et al.,

CASE NO.: 2:24-cv-05459-MWC-MAA

Plaintiffs,

V

DOUG BURGUM, et al.,

Defendants.

and

SABLE OFFSHORE CORP.

Intervenor-Defendant.

**DECLARATION OF DANIEL P.
BRUNTON IN SUPPORT OF SABLE
OFFSHORE CORP.'S OPPOSITION
TO PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT AND
CROSS-MOTION FOR SUMMARY
JUDGMENT**

Hearing

Date: July 11, 2025

Date: July 11, 2015
Time: 1:30 PM

Time: 1:30 PM
Judge: Hon. Michelle Williams Court
Courtroom: 6A

1 Pursuant to 28 U.S.C. § 1746(2), I, Daniel P. Brunton, hereby declare:

2 1. I am an attorney licensed to practice law in the State of
3 California, a member of this court, and am Counsel at Latham & Watkins LLP,
4 counsel of record for Intervenor-Defendant Sable Offshore Corp. (“Sable”) in the
5 above captioned action. I have personal knowledge of the matters recited herein,
6 and if called upon to testify concerning them under oath, I could and would testify
7 thereto.

8 2. A true and correct copy of the Environmental Assessment
9 (“EA”) issued by the Bureau of Ocean Energy Management and relied upon by the
10 Bureau of Safety and Environmental Enforcement (“BSEE”), and the Finding of
11 No Significant Impact (“FONSI”) issued by BSEE regarding Sable’s Lease
12 Extension for the Santa Ynez Unit, dated May 28, 2025, is attached hereto as
13 **Exhibit A.**¹

14 3. A true and correct copy of BSEE's superseding decision
15 regarding Exxon Mobil Corporation's October 19, 2023, request for additional
16 time to resume operations for the Santa Ynez Unit with accompanying
17 Memorandum for the Regional Supervisor, dated May 29, 2025, is attached hereto
18 as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct.

21 | Executed on May 30, 2025.

Daniel Brown

Daniel P. Brunton

²⁸ ¹ The EA and FONSI are available on the agency's website:
27 <https://www.boem.gov/sites/default/files/documents/environment/environmental->
28 assessment/2025_0523_SableEA%202025May28.pdf.